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February 3, 2006

TO: Mr. Russell Hart, RPM
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

FROM: Mr. David Curnock, PM, SECOR International Incorporated *DNC*

RE: **MONTHLY PROGRESS REPORT/MEMORANDUM**
Area 9/10 Remedial Design
Southeast Rockford Groundwater Contamination Superfund Site
Rockford, Illinois

Copies: Mr. Thomas Turner, Regional Counsel, USEPA Region V
Mr. Scott Moyer, Hamilton Sundstrand/United Technologies Corporation
Ms. Kathleen McFadden, United Technologies Corporation
Mr. Thomas Williams, PM, IEPA
Mr. Terry Ayers, IEPA

CURRENT MONTH PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*

Activities conducted in January 2006 consisted of the continuation of Pre-Design Investigation and conceptual design activities. The area of focus at this time with respect to the overall Remedial Design is a portion of the area beneath the Hamilton Sundstrand (HS) Plant #1. There has also been active free product recovery in the South Alley area of the site.

The area beneath the HS facility has been identified as a location of potential source material based on down-gradient groundwater monitoring results. The most likely location of the potential source material is associated with the former area of underground storage tanks (USTs) which were in the central portion of the plant south of the loading dock area.

Earlier this month, as was communicated to you in a telephone conversation, a HS Corporation business decision to realign the facility was announced. This decision will result in changes in the building footprint, a reduction in the manufacturing capacity, and a reduction in personnel. The detailed plans and associated timelines for these changes are now being developed. It is envisioned that most of the transition at the facility will occur over the next eighteen months. As an end result of the facility realignment, it appears that the conditions that restricted access to areas within the western portion of the building may not be site constraints in the future. We will keep the USEPA informed as the actual timeframe of the manufacturing capacity reduction and partial building demolition activities unfold.

Also, during the week of January 30, 2006, the Horizontal Groundwater Monitoring Well Installation and Testing Work Plan was submitted. Although changes at the facility are imminent this work plan was prepared and submitted consistent with the commitment made

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by HS to keep the remedial design activities moving forward. The work plan describes the site background, necessary preparation activities, horizontal well installation technology and methods, groundwater sampling procedures, and the documentation of the activities to be submitted to the USEPA. The purpose of the proposed effort was to better determine the location of potential source areas beneath the building. The work plan was developed under the site constraint that access within the building footprint was not available.

With better access to potential source areas likely to become available, we are presently evaluating other site investigation means to cost effectively identify potential source areas (ie. vertical wells within the building footprint). It is desired that USEPA and HS keep an open dialogue regarding the performance and timing of the continued source identification and remedial design activities for Area 9/10.

The operation and monitoring of hydrocarbon recovery of LNAPL (JP-4) from the recovery systems in the south alley continues. January activities included: 1) the reconditioning of the FAP pumps for RW-1 and RW-2; 2) redeployment of the FAP pumps in wells RW-1 and RW-2 and minor maintenance associated with these wells; and 3) monitoring of the recovery system operation. In January approximately 34 gallons of product were removed by the recovery wells.

FUTURE PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*

Future project activities anticipated for February 2006 and beyond include:

- Final preparation and submittal of the Pre-Design Investigation Data Summary Report. This report includes boring logs, figures, groundwater water level and flow information, and all laboratory analyses undertaken as part of the Pre-Design Investigation to date;
- Operation, maintenance, and monitoring of the South Alley recovery well system and evaluation of the LNAPL (JP-4) presence and recovery rates will continue;
- Development of specific projects and timelines associated with the facility realignment and communication of these final plans with USEPA; and
- Continue collection of water and product level data from the groundwater monitoring network on a periodic basis (next event scheduled for March).

SAMPLE/TEST DATA SUBMITTALS:

None.

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RD SCHEDULE UPDATE: *(attach updated schedule as necessary)*

As the activities associated with the Pre-Design Investigation portion of the Remedial Design (RD) continue, the overall schedule continues to be revised.

A scope of work concerning the source mass reduction (by excavation) of near surface impacted soils in the OSA was submitted to the USEPA and IEPA in April 2005. USEPA determined in October 2005 that the OSA source mass reduction activity was not within the administrative capacity of the existing AOC and that the proposed AOC text changes could not be accepted. As a result, the source mass reduction activity was placed on hold. HS is continuing its evaluation of the alternatives (separate order for the OSA work or at such time as Remedial Action is undertaken) with regard to the OSA work.

With the many changes going on at the facility and the opportunity for substantial site constraints to be removed as part of the facility realignment process, it is desired that an open dialogue regarding the performance and timing of the continued source identification and remedial design activities for Area 9/10 be maintained at this time.

REALIZED/ANTICIPATED PROBLEM CONDITIONS:

None.

PERSONNEL CHANGES:

None.